

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re: Connie Jean Balderson)
Albert Lee Balderson)
) Case No. 16-31532-KRH
)
)
Debtor(s)) Chapter 7
)
Address 2302 Coan Stage Rd.)
Heathsville, VA 22473)
)
Last four digits of Social Security No: 7806 & 8203)
)
)

NOTICE OF MOTION

Connie & Albert Balderson have filed papers with the court to Extend Time to File Reaffirmation Agreement and Statement in Support of Reaffirmation Agreement.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion (or objection), or if you want the court to consider your views on the motion (or objection), then on or before July 22, 2016, you or your attorney must:

X File with the court, at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1(H). If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

America Law Group, Inc.
8501 Mayland Dr. Ste 106
Henrico, VA 23294

- X Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**
- ☐ Attend the hearing on the motion (or objection) scheduled to be held on <date> at <time>, at United States Bankruptcy Court, 701 East Broad Street, Ctrm 5100/5000 Richmond, VA 23219.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: 7/8/2016

Signature, name, address, and telephone
number of person giving notice:

/s/ Richard J. Oulton

Richard J. Oulton, Esq.

America Law Group, Inc.

8501 Mayland Dr., Ste 106

Henrico, VA 23294

Virginia State Bar No. 29640

Counsel for Connie and Albert Balderson

Certificate of Service

I hereby certify that I have this 8th day of July, 2016, mailed or hand-delivered a true copy of the foregoing Amended Notice of Motion to all necessary parties.

/s/ Richard J. Oulton

Richard J. Oulton, Esq.

Creditors

Basic Auto Sales
11371 Washington Highway
Ashland, VA 23005-0000

Calvary Portfolio Services

500 Summit Lake Dr
Ste 400
Valhalla, NY 10595-0000

Capital One

Attn: Bankruptcy
PO Box 30285
Salt Lake City, UT 84130-0000

CashnetUSA
attn: Bankruptcy
175 W Jackson Blvd Ste 1000
Chicago, IL 60604-0000

Cindy Balderson
262 Norman's Corner Rd
Farnham, VA 22460-0000

Cntry Door
Attn:Bankruptcy
PO Box 2830
Monroe, WI 53566-0000

Comenity Bank
PO Box 182124
Columbus, OH 43218-0000

Convergent Outsourcing Inc
800 SW 39th St
PO Box 9004
Renton, WA 98057-0000

Credit Acceptance
25505 West 12 Mile Rd
Suite 3000
Southfield, MI 48034-0000

Credit Control Corp
PO Box 120568
Newport News, VA 23612-0000

Credit Control Corporation
PO Box 120568
Newport News, VA 23612-0000

Dillard Associates PC
229 Prince Street
P.O. Box 356
Tappahannock, VA 22560-0000

DirectTV
attn: Bankruptcy Claims
PO Box 6550
Englewood, CO 80155-6550

Fingerhut
6250 Ridgewood Rd
St Cloud, MN 56303-0000

Ford Motor Credit
PO Box 62180
Colorado Springs, CO 80962-0000

Ford Motor Credit Company LLC
c/o Carl A. Eason, Esquire
200 Bendix Road, Suite 300
Virginia Beach, VA 23452

GE Capital Retail Bank
attn: Bankruptcy Dep't
P.O. Box 1950
Morristown, NJ 07962-1950

Ginnys/Swiss Colony Inc
1112 7th Ave
Monroe, WI 53566-0000

GMAC
now: Ally Financial
PO Box 380901
Minneapolis, MN 55438-0000

Heathesville Animal Clinic
45 Back Street
Heathsville, VA 22473-0000

HFC
PO Box 8873
Virginia Beach, VA 23450-8873

Internal Revenue Service
Insolvency Unit
PO Box 7346
Philadelphia, PA 19101-7346

Kalbaugh, Pfund & Messersmith
901 Moorefield Park Dr.
Ste 200
Richmond, VA 23236-0000

Lexington Consumer Advocacy LL
c/o Customer Care Dep't
337 Garden Oaks Blvd
Houston, TX 77018-0000

MCV Associated Physicians
830 E Main St
Suite 1900
Richmond, VA 23219-0000

Midland Credit Management
8875 Aero Dr, Ste 200
San Diego, CA 92123-0000

Montgomery Ward Credit
3650 Milwaukee St
Madison, WI 53714-0000

Nc Financial
175 W Jackson Blvd
Chicago, IL 60604-0000

NCC
5503 Cherokee Ave
Alexandria, VA 22312-0000

Net Credit
200 W Jackson Blvd
Suite 2400
Chicago, IL 60606-0000

Onward Credit Customer Support
505 N LaSalle St.
Suite 550
Chicago, IL 60654-0000

Pelletteri
1717 Park St
Naperville, IL 60563-0000

Peter S Lake, Esq.
4445 Corporation Lane
Suite 155
Virginia Beach, VA 23462-0000

Rappahannock General Hospital
PO Box 1449
Kilmarnock, VA 22482-0000

Riverside Emergency Phys
PO Box 1929
Kilmarnock, VA 22482-1929

Riverside Health System
Riverside Tappahannock Hospita
PO Box 6008
Newport News, VA 23606-0008

Riverside Health System
PO Box 2858
Raleigh, NC 27602-0000

Seventh Avenue
re: Bankruptcy Dep't
112 7th Ave
Monroe, WI 53566-1364

Springlf Fin
601 Nw 2nd St
Evansville, IN 47708-0000

TD Auto Finance LLC
27777 Inkster Rd.
Farmington, MI 48334-0000

Terry Hatcher
2302 Coan Stage Rd
Heathsville, VA 22473-0000

Usda Rural Development
P.O. Box 790170
St Louis, MO 63179-0000

VCU Health System -- MCV Hosp.
Set-off Debt Section
PO Box 980462
Richmond, VA 23298-0462

Verizon
500 Technology Dr Ste 30
Weldon Spring, MO 63304-0000

Verizon
500 Technology Dr
Suite 500
Weldon Spring, MO 63304-0000

Virginia Department of Taxatio
PO Box 2156
Richmond, VA 23218-0000

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:

Connie and Albert Balderson

16-31532-KRH

Debtor(s)

Chapter 13

**MOTION FOR EXTENSION OF TIME TO FILE
REAFFIRMATION AGREEMENT and STATEMENT IN SUPPORT OF
REAFFIRMATION AGREEMENT**

Debtor(s), by counsel, move the Court and state the following:

1. A voluntary petition under the provisions of title 11 of the United States Code was filed herein on March 29, 2016.
2. Debtor(s) Trustee meeting was set for May 2, 2016.
3. The time to file the Reaffirmation Agreement and Statement in Support of Reaffirmation Agreement expires on July 1, 2016, sixty (60) days following the date of the original Trustee Meeting.
4. For the following reasons the Debtor is unable to file the Reaffirmation Agreement and Statement in Support of Reaffirmation Agreement required by FRBP 4008(a)(b) within the prescribed time:

The Debtors live several hours away from the office and were unable to come in to sign required documents despite repeated requests.

WHEREFORE movant prays the Court for an Order extending Debtor(s) time for filing the Reaffirmation Agreement and Statement in Support of Reaffirmation Agreement.

DATE: 7/8/2016

Respectfully submitted:
Connie and Albert Balderson
By Counsel

/s/ Richard J. Oulton VSB #29640
Counsel for Debtor
America Law Group, Inc.
8501 Mayland Dr. Ste 106
Henrico, VA 23294
Ph: 804-308-0051

Certificate of Service

I hereby certify that I have this 7th day of July, 2016, mailed or hand-delivered a true copy of the foregoing Notice of Motion (or Objection) to the parties listed on the attached service list.

/s/ Richard J. Oulton
Richard J. Oulton
VSB #29640

Creditors

Basic Auto Sales
11371 Washington Highway
Ashland, VA 23005-0000

Calvary Portfolio Services
500 Summit Lake Dr
Ste 400
Valhalla, NY 10595-0000

Capital One
Attn: Bankruptcy
PO Box 30285
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Dillard Associates PC
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DirectTV
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Fingerhut
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Ste 200
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Lexington Consumer Advocacy LL

c/o Customer Care Dep't
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Houston, TX 77018-0000

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830 E Main St
Suite 1900
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Midland Credit Management

8875 Aero Dr, Ste 200
San Diego, CA 92123-0000

Montgomery Ward Credit

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175 W Jackson Blvd
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Net Credit

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Suite 2400
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Suite 550
Chicago, IL 60654-0000

Pelletteri

1717 Park St
Naperville, IL 60563-0000

Peter S Lake, Esq.

4445 Corporation Lane
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Virginia Beach, VA 23462-0000

Rappahannock General Hospital

PO Box 1449
Kilmarnock, VA 22482-0000

Riverside Emergency Phys

PO Box 1929
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Riverside Health System

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Riverside Health System

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**UNITED STATE BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA**

Richmond Division

In re: Connie and Albert Balderson

Case no. 16-31532-KRH

Debtor(s)

Chapter 13

**Proposed ORDER EXTENDING TIME TO FILE
REAFFIRMATION AGREEMENT**

The debtor(s) have filed a motion to extend the time to file their Reaffirmation Agreement. Accordingly it is **ORDERED THAT**

1. The debtor's motion to extend the time to filing the Reaffirmation Agreement is granted.
2. The deadline for filing the Reaffirmation Agreement is extended to July 22, 2016.
3. Failure of the debtor(s) to file the Reaffirmation Agreement on or before the deadline set forth in paragraph two (2) will result in the case being dismissed.

Entered on Docket _____

U.S. Bankruptcy Judge

I ask for this:

/s/ Richard J. Oulton
Richard J. Oulton
Counsel for Debtor(s)
America Law Group
8501 Mayland Dr., Ste 106
Henrico, VA 23294
(804)308-0051

CERTIFICATE OF ENDORSEMENT

Pursuant to Local Rule 9022-1(c)(1), the undersigned hereby certifies that this Order has been endorsed by all the necessary parties.

/s/ Richard J. Oulton
Richard J. Oulton

Parties to receive copies:

Connie and Albert Balderson
2302 Coan Stage Rd.
Heathsville, VA 22473

Peter Barrett, Trustee
Kutak Rock
1111 E. Main St.
Suite 800
Richmond, VA 23219

Richard J. Oulton, Esq.
America Law Group, Inc.
8501 Mayland Dr. Ste 106
Henrico, VA 23294